

**MODULE IV**  
**CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS**  
**AND SCHEDULE OF COMPLIANCE**

**IV.A.        SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN**

- IV.A.1        The Permittee shall implement the corrective action program, as required by UAC R315-8-6.12 and conditions of this Module, for each Solid Waste Management Unit (SWMU) specified in Table 1.
- IV.A.2        The Executive Secretary may add SWMUs to those listed in Table 1 in accordance with the procedures for modification in UAC R315-4-1.5, based on additional information received by the Permittee, the Executive Secretary, or any other knowledgeable source.
- IV.A.3.        The Permittee may request modification of the list of SWMUs from Table 1 through the procedures in UAC R315-4-1.5. Supporting documentation shall accompany the request.

**IV.B.        STANDARD CONDITIONS**

- IV.B.1.        Failure to submit the information required by Module IV or falsification of any submitted information, is grounds for termination of this permit in accordance with UAC R315-3-4.4. Any noncompliance with approved plans and schedules shall be deemed noncompliance with this permit and may be subject to enforcement action.
- IV.B.2.        The Permittee shall sign and certify all plans, reports, notifications, and other submissions to the Executive Secretary in accordance with Condition I.X.
- IV.B.3.        The Permittee shall submit one copy of each plan, report, notification, or other submissions required by this module, to the Executive Secretary.
- IV.B.4.        The Permittee can submit a written request for extensions of the compliance schedule due dates specified in Table 2. The Executive Secretary will provide a written approval or denial from such request.
- IV.B.5.        All raw data, including laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to conditions in Module IV shall be maintained at UTTR or HAFB during the effective term of this permit.
- IV.B.6.        Discoveries made during the course of groundwater monitoring, field investigation or environmental auditing, conducted in accordance with this module, or other facility activities which indicate that hazardous waste or hazardous waste

constituents have been released from a SWMU, shall be reported in writing as a Release Report, as specified in Table 2.

- IV.B.7. The Permittee shall submit certain information, plans and reports to the Executive Secretary for review and approval in accordance with the time frames specified in Table 2. The Executive Secretary shall approve or disapprove submitted documents. The Executive Secretary shall provide the Permittee with comments for any document that is not approved. The Permittee shall revise any document that the Executive Secretary comments on and resubmit it within time frames to be specified by the Executive Secretary. Subsequent changes to an approved document must be approved by the Executive Secretary.

**IV.C. REPORT OF CURRENT CONDITIONS**

- IV.C.1. The Permittee shall submit to the Executive Secretary a Current Conditions Report in accordance with the schedule specified in Table 2. The report shall include data gathered during any previous investigations or inspections and other relevant data, including all of the following:
- IV.C.1.a. Maps depicting:
- IV.C.1.a.i. All known past and present SWMUs, and
- IV.C.1.a.ii. All known product and waste underground tanks, including past or present piping.
- IV.C.2. All maps shall be consistent with the requirements set forth in UAC R315-3-2.5 (b)(19) and be of sufficient detail and accuracy to locate and report all current and future work performed at the site.
- IV.C.3. The Report shall include a history and description of ownership and operation, including a description of solid and hazardous waste generation, treatment, storage, and disposal activities at each SWMU.
- IV.C.4. The Report shall include dates of past product and waste spills, type of materials spilled, amount spilled, location where spilled, and a description of the response actions conducted, including any inspection reports, technical reports or other reports generated as a result of the response.
- IV.C.5. The Report shall include a list of relevant environmental documents and studies prepared for UTTR.
- IV.C.6. For each SWMU, the Report shall summarize all possible sources of contamination. This includes all waste and product spill areas, and other suspected sources of contamination. For each source, the Permittee shall identify quantities of solid and hazardous wastes managed at the source.

- IV.C.7. The Report shall provide a preliminary site conceptual model that includes a description of all potential migration pathways, including information on geology, geomorphology, hydrogeology, geochemistry, water quality, meteorology, air quality and receptors.

**IV.D. RCRA FACILITY ASSESSMENT**

- IV.D.1. The Executive Secretary has conducted a RCRA Facility Assessment (RFA) of the Permittee's site. The RFA includes the following:

IV.D.1.a. File Review;

IV.D.1.b. Employee interviews and

IV.D.1.c. Site Inspections.

IV.D.2. The Executive Secretary has compiled a RFA Findings Report.

IV.D.3. The report shall include a topographic map of the facility indicating the location of all SWMUs identified.

IV.D.4 The report shall addresses the following:

IV.D.4.a. Nature of facility operations;

IV.D.4.b. Description of each SWMU;

IV.D.4.c. Description of past and present operations at each SWMU;

IV.D.4.d. Waste characteristics at each SWMU and

IV.D.4.e. Evidence of release.

**IV.E. RCRA FACILITY INVESTIGATION**

- IV.E.1. The Permittee shall conduct a RCRA Facility Investigation (RFI) to determine the nature and extent of known or suspected releases of hazardous waste(s) or hazardous waste constituents from the SWMUs listed in Table 1. The Permittee shall conduct the RFI in two phases which shall be identified as Phase I (Release Assessment) and Phase II (nature and extent) RFI activities. The Phase I and Phase II RFI work plans shall detail investigation activities and objectives, and shall be based on guidance in EPA Directive Numbers 9902.3-2A (RCRA Corrective Action Plan) and 9502.00-6D ( RCRA Facility Investigation Guidance EPA /530/SW-89-031, 4 Volumes).

- IV.E.2. The permittee shall submit a Phase I RFI Workplan (Field Sampling Plan) as specified in Table 2. The purpose of the Phase I RFI Workplan is to detail procedures for determining if contamination exists at each SWMU. The Phase I RFI Workplan shall specify procedures to be used to establish site or regional, and if necessary local or area specific, background levels for inorganic constituents. Upon approval by the Executive Secretary, the Permittee shall perform the Phase I RFI Workplan activities as specified in the approved work plan. The Phase I RFI Workplan shall, at a minimum, contain the following plans:
- IV.E.2.a. Project Management Plan;
  - IV.E.2.b. Data Collection Quality Assurance / Quality Control Plan;
  - IV.E.2.c Data Management Plan;
  - IV.E.2.d. Health and Safety Plan;
  - IV.E.2.e. Community Relations Plan; and
  - IV.E.2.f. Phase I RFI Workplan Schedule.
- IV.E.3. The Permittee shall submit Phase I RFI Workplan Progress Reports as specified in Table 2.
- IV.E.4. The Permittee shall submit a Phase I RFI Final Report (Release Assessment Report), as specified in Table 2. This report shall describe activities conducted to fulfill the requirements of the approved Phase I RFI Workplan and shall be of adequate technical quality to evaluate whether a release of hazardous waste or hazardous waste constituents has occurred at each SWMU. If the Phase I RFI Final Report can satisfactorily demonstrate adequate site characterization, the Permittee may petition for no further action (NFA) as specified in Condition IV.H below, or 2) risk based closure, as specified in Condition IV.J below, for any SWMU. The Report shall identify SWMUs that require additional investigation under the Phase II RFI.
- IV.E.5. The Permittee shall prioritize each SWMU identified for additional investigation pursuant to preliminary indications of contamination, according to the SWMU's potential threat to human health or the environment.
- IV.E.6. The Permittee shall submit a Phase II RFI Workplan as specified in Table 2 for SWMUs requiring additional investigation. The purpose of the Phase II RFI is to characterize each SWMU by defining the nature and extent of contamination. Upon approval of the Phase II RFI Workplan by the Executive Secretary, the Permittee shall perform the Phase II RFI Workplan activities as specified in the approved work plan. The Phase II RFI Workplan shall, at a minimum, include the following plans and information:

- IV.E.6.a. Project Management Plan;
- IV.E.6.b. Data Collection Quality Assurance /Quality Control Plan;
- IV.E.6.c. Data Management Plan;
- IV.E.6.d. Health and Safety Plan;
- IV.E.6.e. Characterization of the Environmental Setting;
- IV.E.6.f. Source Characterization;
- IV.E.6.g. Contamination Characterization; and
- IV.E.6.h. Phase II RFI Workplan Schedule.
- IV.E.7. The Permittee shall submit Phase II RFI Workplan Progress Reports as specified in Table 2.
- IV.E.8. The Permittee shall submit a Phase II RFI Final Report as specified in Table 2. This report shall describe activities conducted to fulfill the requirements of the approved Phase II RFI Workplan and shall be of adequate technical quality to support the development and evaluation of subsequent documentation and the associated recommendation(s).
- IV.E.9. Based on the Phase II RFI Final Report, the Permittee shall recommend future management activities which may include: 1) no further action based on constituent concentrations being nondetect or below preapproved background levels, 2) closure by removal, 3) risk-based closure, or 4) site management.

**IV.F. INTERIM MEASURES**

- IV.F.1. The Permittee or the Executive Secretary may at any time during the term of this Permit identify and propose to the other party an interim measure. Interim measures shall be limited to measures designed to prevent or abate a potential or immediate threat to human health or the environment. The following factors shall, at a minimum, be considered when developing an interim measure:
  - IV.F.1.a. Time required to develop and implement a final remedy;
  - IV.F.1.b. Actual or potential exposure of human or environmental receptors;
  - IV.F.1.c. Actual or potential contamination of drinking water supplies or sensitive ecosystems;

- IV.F.1.d. The potential for further environmental degradation without interim measures;
- IV.F.1.e. Presence and concentration of hazardous waste, or hazardous waste constituents, in the soil that have the potential to migrate to groundwater or surface water;
- IV.F.1.f. Weather conditions that may promote the spread of contamination;
- IV.F.1.g. Risks of fire, explosion, or accident; and
- IV.F.1.h. Other situations which may pose a threat to human health or the environment.
- IV.F.2. If the parties agree on the appropriateness of such measures, or if the Executive Secretary determines the need for an interim measure, the Permittee shall submit for approval by the Executive Secretary an Interim Measures Plan. The Interim Measures Plan shall identify specific actions to be taken to implement the interim measures and a schedule for implementing the required measures. The Interim Measures Plan shall include, but not be limited to the following:
  - IV.F.2.a. Objectives showing how the measure is mitigating a potential threat to human health and the environment and is consistent with and integrated into any long term solution;
  - IV.F.2.b. Data collection quality assurance and data management information;
  - IV.F.2.c. Design plans and specifications, construction requirements, operation and maintenance requirements, project schedules, and final design documents;
  - IV.F.2.d. Construction quality assurance objectives, inspection activities, sampling requirements, documentation; and
  - IV.F.2.e. Schedule for submittal of the following reports: progress reports, interim measures workplan, final design documents, draft interim measures report, and final interim measures report.
- IV.G. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNITS**
  - IV.G.1 The Permittee shall provide written notification to the Executive Secretary of any newly identified SWMU, within thirty (30) calendar days of discovering the SWMU. The notification shall include the location of the new SWMU, the dates of its operation, and all available information regarding wastes identified or suspected.
  - IV.G.2. The Permittee shall request modification of Table 1 to incorporate any newly identified SWMU in accordance with UAC R315-4-1.5, within 90 days of discovery.

The request to incorporate any newly identified SWMU into Table 1 will constitute a Class 1 modification.

- IV.G.3. The Permittee shall submit a SWMU Assessment Plan for Executive Secretary approval as specified in Table 2. The SWMU Assessment Plan shall, at a minimum, include the following:
  - IV.G.3.a. Information concerning past and present operations of the unit(s);
  - IV.G.3.b. Data Collection Quality Assurance/Quality Control Plan;
  - IV.G.3.c. Data Management Plan; and
  - IV.G.3.d. A schedule for implementation of the SWMU Assessment Plan.
- IV.G.4. The Permittee shall implement the SWMU Assessment Plan within thirty (30) calendar days of receiving written approval of the plan from the Executive Secretary.
- IV.G.5. The Permittee shall submit a SWMU Assessment Report as specified in Table 2. The Report shall describe activities conducted to fulfill the requirements of the approved SWMU Assessment Plan and shall be of adequate technical quality to support the development and evaluation of subsequent documentation and its associated recommendation(s). At a minimum, the Report shall provide the following information for each newly identified SWMU:
  - IV.G.5.a The location of the SWMU identified on a map;
  - IV.G.5.b. The type of the unit, including dimensions and a structural description;
  - IV.G.5.c. The period during which the unit was operated and
  - IV.G.5.d. All solid or hazardous wastes that were or are being managed at the SWMU including results of any sampling and analysis used to determine whether releases of hazardous wastes or hazardous waste constituents have occurred, are occurring, or have the potential to migrate or originate from the SWMU.
- IV.G.6. The Permittee shall amend the Phase II RFI Workplan and any other subsequent documents as specified in Table 2 to include investigation of the newly identified SWMU, if the SWMU Assessment Report indicates the contamination was not sufficiently characterized during the SWMU Assessment investigation.

#### **IV.H DETERMINATION OF NO FURTHER ACTIONS**

- IV.H.1. Based on the results presented in the Phase I RFI Final Report or the Phase II RFI Final Report, the Permittee may submit a request for No Further Action (NFA) to the

Executive Secretary. The request can address individual SWMUs, groups of SWMUs, or all SWMUs. The request shall demonstrate that at least one of the following standards has been met: 1) constituent levels are non-detectable using pre-approved analytical methods, 2) constituent levels are below pre-approved background values, or 3) the level of risk to human health is below  $1 \times 10^{-6}$  for carcinogens and a Hazard Index of “less than one” for non-carcinogens, based on an approved risk assessment, conducted in accordance with UAC R315-101-5.2 (b)(1). The request shall also include an ecological risk assessment that demonstrates there is no significant risk to ecological receptors.

- IV.H.2. The Executive Secretary shall review the request, and all other relevant information. If the Executive Secretary determines that one of the conditions identified in Condition IV.H.1. has been met, the Executive Secretary shall approve the request for NFA. If the Executive Secretary denies the request, he shall provide the Permittee with a written notice outlining the basis for the denial.
- IV.H.3. A determination of no further action, in accordance with Condition IV.H.1., shall not preclude the Executive Secretary from requiring further investigations, studies, or remediation at a later date if new information or subsequent analysis indicates a release or potential of a release from a SWMU. In such a case, the Executive Secretary shall initiate either a modification to the Corrective Action Schedule of Compliance (Table 2) in accordance with Condition I.D., or rescind the determination of NFA.

#### **IV.I. CLEAN CLOSURE BY REMOVAL**

- IV.I.1. The Permittee may choose to close SWMUs by removing hazardous waste and hazardous waste constituents to levels that meet the NFA requirements of Condition IV.H. If the Permittee chooses to close by removal, then the Permittee shall submit, for review and approval, a Corrective Action Plan (CAP) including proposed sampling and analytical methods for verification of removal as specified in Table 2 and Condition IV.L.

#### **IV.J. RISK ASSESSMENT**

- IV.J.1. The Permittee may choose to close SWMUs by assessing the risk to human health and the environment associated with any contamination that the Permittee proposes to leave in place. These risks shall be assessed in a Risk Assessment Report (RAR) prepared in accordance with UAC R315-101, submitted to the Executive Secretary for review and approval. The risk assessment for human health shall be conducted using one or both standard exposure scenarios (residential and actual) as needed to determine site risk management options. The RAR shall also include an ecological risk assessment that demonstrates the level of risk to ecological receptors. A request for a waiver from the ecological risk assessment requirement may be submitted to

the Executive Secretary and granted, if it can be shown that no biological community or significant ecological endpoints exist at the SWMU(s).

- IV.J.2. If the Executive Secretary agrees through a review of the RAR that the risk to human health present at the site is less than  $10^{-6}$  for carcinogens and the hazard index is less than one for non-carcinogens, using the residential exposure scenario, and the effects on ecological endpoints are insignificant, then the Executive Secretary shall approve the request for a NFA.
- IV.J.3. If the Executive Secretary agrees through a review of the RAR that the risk to human health present at the site is greater than  $10^{-6}$  using a residential exposure scenario but less than  $10^{-4}$  using actual land use conditions for carcinogens or the hazard index is less than one for non-carcinogens, using both exposure scenarios, or any detrimental effects on ecological endpoints can be mitigated by site management, then the Permittee shall submit a Site Management Plan (SMP), as specified in Table 2.
- IV.J.4. If the Executive Secretary agrees through a review of the RAR that the risk to human health present at the site is greater than  $10^{-4}$  for carcinogens or the hazard index is greater than one, using the actual exposure scenario, or any detrimental effects on ecological endpoints warrant corrective action, then the Permittee shall submit a Corrective Action Plan (CAP) as specified in Table 2.

**IV.K. SITE MANAGEMENT PLAN (SMP)**

- IV.K.1. The Permittee shall submit a SMP as specified in Table 2 for all SWMUs that meet the criteria of Condition IV.J.3. The SMP shall propose appropriate institutional controls (e.g., monitoring, deed notations, site security, site inspections, or post-closure care) as determined on a case-by-case basis in accordance with the criteria identified in UAC R315-101. The institutional controls may be reevaluated at a future date.

**IV.L. CORRECTIVE ACTION PLAN (CAP)**

- IV.L.1. Based on the results of the RFI the Permittee shall submit to the Executive Secretary, for review and approval, a CAP for all SWMUs that meet the criteria of Condition IV.J.4.
- IV.L.2. The purpose of the CAP is to develop and evaluate and propose corrective action alternatives which will satisfy the target clean up objectives. The criteria identified in UAC R315-101-1 (b)(4) of the Rules shall be considered in the determination of appropriate corrective action. The CAP, at a minimum, shall include:
- IV.L.2.a. Project Management Plan;
- IV.L.2.b. A summary of RFI information and data, as needed to prepare the CAP;

- IV.L.2.c. Proposed remediation goals or target cleanup objectives;
- IV.L.2.d. The corrective actions proposed to satisfy cleanup objectives;
- IV.L.2.e. Data Collection Quality Assurance /Quality Control Plan;
- IV.L.2.f. Data Management Plan; and
- IV.L.2.g. A schedule for implementation of the corrective action(s).
- IV.L.3. Upon approval of the CAP, the Permittee shall implement the corrective action(s) according to the schedule approved in the CAP. The Permittee shall furnish or retain all personnel, materials and services needed to implement the CAP.
- IV.L.4. The Permittee shall submit CAP Progress Reports as specified in Table 2.
- IV.L.5. The Permittee shall submit a Cleanup/Management Report (CMR) as specified in Table 2. The CMR shall be prepared in accordance with UAC R315-101-8 (b).
- IV.L.6. The Permittee shall submit a Certification of Completion (CC) as specified in Table 2. The CC shall be prepared and submitted in accordance with UAC R315-101-8 (c).

**IV.M. REPORTING REQUIREMENTS**

- IV.M.1. The Permittee shall submit to the Executive Secretary written semi-annual progress reports, as specified in Table 2, of any activities conducted pursuant to the conditions of Module IV.
- IV.M.2. The semi-annual progress reports shall contain:
  - IV.M.2.a. A description of the work completed;
  - IV.M.2.b. Summaries of all findings and all raw data;
  - IV.M.2.c. Summaries of all problems encountered during the reporting period and actions taken or to be taken to rectify problems; and
  - IV.M.2.d. Projected work for the next reporting period.
- IV.M.3. The Permittee shall maintain copies of other reports, drilling logs, and data at UTTR or Hill AFB during the effective period of this permit. The Permittee shall provide copies of all reports, logs, and data to the Executive Secretary upon request.

IV.M.4. The Executive Secretary may require the Permittee to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in reports or other supporting information.

**IV.N. MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE**

IV.N.1. A request for modification of the final compliance dates specified in Table 2 may be submitted to the Executive Secretary as a permit modification, in accordance with UAC R315-3-15 (d).

IV.N.2. Pursuant to UAC R315-4-1.5 (a), the compliance schedules specified in Table 2, may be modified by the Executive Secretary if it is determined that good cause exists for the changes.

IV.N.3. The Permittee shall use its best effort to secure all funds that may be required for implementation of the requirements in this Module, pursuant to the compliance schedule in Table 2.

IV.N.4. Failure to obtain adequate funds or appropriations shall not in any way release the Permittee from its obligation to implement the requirements of this Module or any other requirement of this permit, RCRA, or the Utah Solid and Hazardous Waste Act.

IV.N.5. If adequate funds are not available to implement the requirements of this Module or any other requirement of this permit, RCRA, or the Utah Solid and Hazardous Waste Act., the Executive Secretary and the Board reserve the right to pursue any actions deemed necessary to protect human health and the environment, not excluding judicial recourse or termination of this permit.

**Table 1 Module IV**  
**Solid Waste Management Units at**  
**the Utah Test and Training Range**  
**(SWMU List)**

SWMU Number	Period of Operation	DESCRIPTION of SWMU
2	1980s	CBU Valley Disposal Trenches (munitions & debris)
3	1983 to '95	Craner's Munitions Pit (practice bombs)
4	1972 to Present	Oil/Water Separator at Eagle Tower (maintenance building)
5	Subtitle D	Oasis "dry" Municipal Landfill/Monofill (Solid Waste Permit)
6	Subtitle D	Oasis Wet Landfill (municipal waste)
7	Module V	Landfill # 5 (Hazardous Waste Post Closure Permit)
8	Clean Closed	Lithium Battery Deact. Facility (Clean Closed, August 1999)
9	1950 to '91	TTU Residual Pits (Sedal Pass)
10	1950 to '95	TTU Munitions Burn Pit (Site #3)
11	Module III	TTU Operations Area (all OB & OD Pads)
13	1968 to '95	Oasis Sewage Lagoon
14	1968 to '92	Oasis Fire Training Area
15	1980 to Present	Oasis MWR Yard (active operations site)
16	1980 to Present	Oasis Target Yard (active operations site)
17	1988 to '98	CBU Valley Detonation/Debris Craters (Great Balls of Fire)
18	1991 to Present	Satellite Accumulation Site LM-34 (Oasis Propellant cuttings)
19	1991 to '93	Satellite Accumulation Site TE-05 (Eagle, lead-acid batteries)
20	1991 to Present	Satellite Accum. Site TE-06 (Eagle Vehicle Maintenance)
21	1991 to Present	Satellite Accumulation Site TM-04 (Oasis, Inside MWR Yard)
22	1993 to Present	Satellite Accum. Site TU-02 (Oasis, Vehicle Maintenance)
23	Closed UST Program	Satellite Accumulation Site TU-03 (Oasis, UST - used oil)
24	1988 to Present	90 - Day Accumulation Site TU-05 (Oasis, Old 90 day site)
25	Renamed (37-47)	Eagle Range Disposal Pits (Now SWMU's 37 through 47)
27	1962 to Present	LM Missile Motor Test Pads (active operations site)
29	1960s to '95	M60 Firing Range
30	? to Present	HAG Munitions Pits (Spent & Live ordnance and debris)
31	1985 spill	Oasis Sulfuric Acid Spill (above ground tank, 3,000gal spill)
33	? to 1995	CBU Valley Target Yard (saddle north of CBU Valley)
34	1980 to '95	CBU Valley Craters (lots of munitions and debris)
36	1950s to '95	Target 22 Munitions Pits (open & buried trenches)
37	1975 to '95	Disposal Pits by Main Bomb Circle #1 (old # M-1, 2 & 3)
39	1975 to '83	Disposal Pits adjacent to N and W strafe runs (old # M-6 & 7)
43	1980s	Disposal Trenches N of fence, W of Bravo Gate (old # M-11)
44	1980 to '90	Disposal Pits at Target #18 (old # M-12, 13 & 14)

**Table 1 Module IV (Continued)**  
**Solid Waste Management Units at**  
**the Utah Test and Training Range**  
**(SWMU List)**

SWMU Number	Period of Operation	DESCRIPTION of SWMU
48	1960s to '89	Big Papa Disposal Pits (E trenches, W craters & N crater)
60	1969 to '88	Little Papa Bomb Crater Debris Dump ( propagation testing scrap)
61	1969 to '88	Little Papa Bomb Crater Debris Dump (spent flairs and other scrap)
62	1965 to '75	HAG Munitions Trenches (buried and open, munitions)
65	1960s to '90s	Target 24 Submunitions Trenches (open, west edge of target)
67	1964 to '88	Target 13 & 24 Munitions Trenches (open, munitions & target debris)
71	Closed out	Smoky Sam Igniters (surface, about 12 spent Smoky Sam igniters)
91	1970s to '92	Agent Orange Drum (25% full 55-gallon drum, removed in 1992)
92	1979 to '86	Sink Valley Burial Trench (munitions & B-52 parts near Big Papa)
95	1970s to mid'80s	CBU Valley Crater with Debris (open, munitions & debris)

**Table 2. RCRA Facility Investigation Compliance Schedule  
for Solid Waste Management Units (SWMUs)**

<u>RFI Activity</u>	<u>Due Date (calendar days)</u>
Submit Current Condition Report	Within 90 days of permit issuance. Group I Draft Current Conditions Report submitted Group II Draft Current Conditions Report submitted Group III Draft Current Conditions Report submitted Group IV Draft Current Conditions Report submitted
Submit Phase I RFI Workplan (Field Sampling Plan)	Within 90 days of receipt of written request from the Executive Secretary. Group I Field Sampling Plan submitted and approved Group II Field Sampling Plan submitted and approved Group III Field Sampling Plan submitted and approved Group IV Field Sampling Plan submitted
Submit Phase I RFI Final Report (Release Assessment Report)	Within 180 days of approval of the Phase I RFI Workplan. Group I Draft Release Assessment Report submitted Group II Draft Release Assessment Report submitted Group III Draft Release Assessment Report submitted Group IV No Document Submitted
Submit Phase II RFI Workplan	Within 180 days of approval of the Phase I RFI Final Report. (If Phase I RFI indicates a need for a Phase II)
Submit Phase II RFI Final Report	With 180 days of approval of the Phase II RFI Workplan.
Submit Risk Assessment Report	Within 90 days of approval of the Phase II RFI Final Report. (If RFI indicates a need for a RAR)
Submit Site Management Plan	Within 60 days of approval of the Risk Assessment Report or Final RFI Report if no RAR needed.
Submit Corrective Action Plan	Within 180 days of approval of the Phase II RFI Final Report or within 180 days of acceptance of the Risk Assessment Report.
Submit Cleanup/Management Report	Within 180 days of approval of the Site Management Plan or Corrective Action Plan.
Submit Certification of Completion	Within 60 days of completion of approved Site Management or Corrective Action.
Submit Progress Reports for field activities associated with Phase I and Phase II, Corrective Action, Site Management, and SWMU Assessment.	Every June and December beginning from approval of an applicable activity and until the submittal of an applicable final report.

**Table 2. RCRA Facility Investigation Compliance Schedule  
for Solid Waste Management Units (SWMUs) (Continued)**

Submit Release Report	Within 15 days of discovery.
Submit SWMU Notification	Within 30 days of identification of newly identified SWMU
Submit SWMU Assessment Plan	Within 90 days of identification of newly identified SWMU
Submit SWMU Assessment Report	Within 120 days of approval of SWMU Assessment Plan.
Document Amendment	Within 90 days of approval or acceptance of preceding document.
Revised Documents	Within 90 days after comments are issued.